

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

Debtor.

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SUMMARY SHEET: COHEN & GRESSER, LLP

Interim Fees Sought	Interim Fees Awarded	Interim Expenses Sought	Interim Expenses Awarded	Fees Sought in this Application	Expenses Sought in this Application
\$177,623.50	\$132,455.00	-0-	-0-	45,168.50	\$19.05

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Blended Hourly Rate
Nicholas J. Kaiser	1983	147.7	795.00	\$553.30
Matthew V. Povolny	2007	34.5	725.00	
Randall W. Bryer	2017	9.7	600.00	
Christine M. Jordan	2017	47.0	600.00	
Megan E. Polomene	N/A	2.9	300.00	
Anthony Megliola	N/A	1.0	300.00	

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

Debtor.

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**FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF COHEN & GRESSER, LLP,
PURSUANT TO SECTION 330 OF THE BANKRUPTCY CODE**

Cohen & Gresser LLP (“CG” or “Applicant”), special counsel for Outpost Pines, LLC (the “Debtor”), as and for its final application for allowance of compensation and reimbursement of expenses for the period of February 27, 2023 through November 1, 2023 under §331 of the Bankruptcy code, for final compensation of \$177,623.50 in fees, plus disbursements of \$19.05 for a total of \$177,642.55 and that the Debtor be authorized to pay that amount to the Applicant respectfully represents as follows:

APPLICATION

1. On February 27, 2023 (“Petition Date”), the Debtor filed a Chapter 11 petition under Title 11 of the United States Code, 11 U.S.C. 101 et seq. (the “Bankruptcy Code”).
2. The Debtor owns, and through non-Debtor affiliates, operates properties (the “Properties”) in the Fire Island Pines community (the “Pines”). The Pines is the largest LGBTQ+ resort in the United States and welcomes over 250,000 people each season.
3. The Properties are mixed-use and account for about 80% of the Pines commercial district. In season, the Debtor’s non-Debtor affiliates employ 120 workers,

entertainers, DJs and other artists. The Debtor's affiliates provide the major source of food, beverage, shopping, entertainment and community to the homeowners and renters that surround the Debtor's Properties.

4. At 49 & 56 Picketty Ruff Walk, an affiliate runs the Blue Whale restaurant and bar, and the hotel featuring 19 guestrooms and one retail store and a leased office ("Hotel"). 37 Fire Island Boulevard is the Pavilion building. The ground floor features a gym and juice bar, two retail stores and administrative offices. The upper floor features the Pavilion nightclub and outside bar. 28 Fire Island Boulevard is a three-bedroom two-bathroom house that serves as a staff accommodation. 16 Atlantic Walk is a 16-bedroom/eight-bathroom residence built in 1975 and renovated in 2016 that also houses resort staff in the summer season.

5. The Properties also feature about 320 feet of frontage along the harbor, with room for 9 boat slips with an average size of 35 feet.

6. On March 31, 2015, the Debtor borrowed \$8 million from Progressive Credit Union (the "Loan") under an agreement ("Loan Agreement") to acquire the Properties. The Loan Agreement has a ten-year term, the interest rate is 3% and has a five-year extension option. The Loan was assigned to Pentagon Federal Credit Union and then to Mortgagee ECapital Loan Fund III LP.

7. The Debtor paid the Lender timely until the pandemic related government-ordered shutdown of the hospitality industry. The travel restrictions and quarantine requirements caused the Debtor to delay its 2020 seasonal opening and to dramatically curtail operations when it did open on May 29, 2020. When the government lifted restaurant and bar seating and social

distancing requirements in June 2021, the Debtor and Debtor affiliates resumed reduced operations for the 2021 season and full operations for the 2022 season. Income rebounded and exceeded pre-pandemic levels.

8. Meanwhile, in March 2020, the Debtor contacted the Lender when it could not reopen in April 2020. Pentagon Federal Credit Union had just taken over Progressive Credit Union, the initial Lender, in an emergency merger. The Debtor promptly provided all documentation the Lender requested. Debtor's counsel conveyed many verbal settlement proposals to Lender's counsel. The Lender agreed to defer debt service for May 2020 through September 2020 and extended the Loan maturity date from April 1, 2025 to October 1, 2025. At the Lender's request, on August 6, 2021, the Debtor made a formal written restructuring proposal, and then another on April 7, 2022.

9. By then, the Lender had accelerated its Loan and demanded payment in full of all amounts due including principal, interest, default interest and other charges. On January 19, 2022, the Lender commenced a foreclosure action in the Supreme Court of Suffolk County. The case was largely dormant while counsel to the parties continued to negotiate.

10. The Debtor repeatedly offered to reinstate the Loan once its business rebounded and it had access to enough cash. The Lender repeatedly refused tender unless the Debtor paid five times the amount of the overdue interest as a penalty for late payment.

11. The Lender finally agreed to an in-person meeting on July 26, 2022, followed by telephonic meetings on October 7, 2022. On October 7, a loan modification was agreed upon subject only to Lender's senior management approval. Then the Lender went silent.

The last communication from the Lender before its sale of the Loan to ECapital Loan Fund III LP was an October 12, 2022 email from the Lender stating that senior management was still reviewing the modification terms.

12. Since accruing 16% default interest made the loan easier to sell, it now seems obvious that the Lender was delaying the Debtor while marketing the paper. Indeed, the Lender engaged a national broker to market the Loan and obtained a real estate collateral appraisal in January 2022 establishing a \$13,500,000 fair market asset value, far more than the amount owed to the Lender under any analysis. The appraisal assumes a \$1,500,000 discount for hotel renovations.

13. On November 4, 2022, the Debtor was notified that ECapital Loan Fund III acquired the Loan. From November 4, 2022 through the bankruptcy filing date, ECapital repeated Pentagon Federal Credit Union's negotiate, delay and disappear strategy. For example, the Debtor was promised an updated settlement proposal on February 3, 2023, but the Lender provided nothing despite multiple emails and voice messages.

14. Fearing the *ex-parte* appointment of receiver who likely could not preserve and protect the value of the Debtor's unique operation, the Debtor commenced this Chapter 11 case to save its business and over 120 jobs.

15. The Debtor estimates that \$7,347,551 of principal is due on the Loan. The Lender asserts that the Debtor owes about \$2,385,000 for 16% default interest, as compared to about \$532,000 for 3% regular interest. Amortization payments are due as well. The Lender also demands escrow replenishments of about \$218,000, legal fees of \$25,000 and late charges of

\$14,764, none of which the Debtor can concede absent more detail and analysis. The Debtor projects that the ultimate cure cost to reinstate the Loan will be between \$1,254,674 and \$3,108,142 for interest, amortization, escrow replenishments, legal fees and late fees.

16. Aside from mortgage debt, the Debtor's obligations include an insider loan of about \$1,549,221, an SBA disaster assistance loan of about \$161,941 and vendor claims of about \$8,200.

17. The Debtor filed its schedules, bar date application, cash collateral application, attorney retention applications and Plan and disclosure statement ("Disclosure Statement") with its Chapter 11 petition.

18. The Plan invokes section 1124(2) of the Bankruptcy Code, under which a creditor may be compelled to reinstate an obligation in default even if the obligation could not be reinstated under state law. The Debtor provided extensive briefing in the Disclosure Statement explaining why, section 1124(2), the Debtor asserts that it should not have to pay default interest as a condition to reinstatement.

19. The Mortgagee responded to none of those applications including Disclosure Statement approval. The Court thus approved the Disclosure Statement at the first hearing scheduled and confirmation for May 24, 2023.

20. Following Disclosure Statement approval, the Mortgagee finally agreed to engage in good faith negotiations and ultimately the parties agreed on most terms. The Debtor's goal was to present a settlement to the Court at the confirmation hearing as part of an amended Plan.

21. Unfortunately, while the parties were busy trying to settle, the Town of Brookhaven building inspector condemned the Hotel.

22. By status report Dated May 12, 2023, the Debtor explained to the Mortgagee and the Court that this was a total surprise, and explained the steps it would take to determine whether the condemnation would affect the Debtor's Plan. The Debtor verified the facts contained in the status report when deposed by the Mortgagee. Fortunately, the condemnation does not materially affect the Debtor's Plan projections nor would it materially change the settlement the parties were pursuing.

23. Presented with the chance to defuse the threat that this Court may adopt the Debtor's argument that it may reinstate the note and mortgage, the Mortgagee has searched in vain for an argument that the Debtor has tried to deceive the Court and the Mortgagee to achieve some undisclosed bad faith agenda.

24. Thus, the Mortgagee argues that Debtor concealed facts about the Hotel's condition that it knew or should have anticipated. But the Mortgagee has studiously avoided revealing that its own professionals inspected the Properties on April 7, 2023. Had they seen such problems, surely they would have told the Debtor to protect all involved from harm. Had they seen such problems, certainly they would have insisted that the Debtor's Disclosure Statement include a description.

25. Either way, the discovery conducted by the Mortgagee has confirmed every representation the Debtor made to this Court. The discovery revealed further that the conditions

leading to condemnation were not as bad as feared and that the repair costs are manageable. The repair costs were about \$60,000 to reopen the first floor.

26. Settlement negotiations resumed and the parties ultimately executed the Settlement Agreement. Under the Settlement Agreement, the parties agreed to a sale process for all of the real estate underlying the Outpost businesses on a going concern basis, including both the Debtor's real estate and the real estate owned by an ECapital affiliate subject to the Debtor's ground lease. The parties agreed that the Debtor would retain Muroff Hospitality Group as broker.

27. In full and final satisfaction of its claims against the Debtor, ECapital agreed to accept (a) a \$11,200,000 ("Breakpoint") gross purchase price until November 1, 2024 or (b) if the Properties are not sold by November 1, 2024, the Debtor will surrender its properties to ECapital. The Debtor agreed further to use reasonable efforts to reopen lapsed building permits to rebuild the Hotel (with no obligation to rebuild the Hotel), to pay ground lease rent on the Canteen, to pay debt service at the non-default contract rate of 3%, to pay real estate taxes, to operate the business, and to be responsible for any operating losses. The Debtor is entitled to retain accrued and accruing net operating income. On or before October 1, 2024, the Debtor is also obligated to deposit \$300,000 in escrow to either be applied towards the Breakpoint, or retained by ECapital if there is no sale.

28. Except for the revision to ECapital's treatment under the Plan, all other creditors are entitled to the same payment as before the revision.

29. On October 31, 2023, the Bankruptcy Court entered an order confirming the Plan as amended to incorporate the settlement, and the Plan was consummated on November 1, 2023.

30. CG has assisted the Debtor by advising on day-to-day matters since the Petition Date, including, without limitation, real estate, corporate and employment matters. CG also represented the Debtor and its management in responding to subpoenas, document preparation, defending at depositions conducted by Mortgagee. CG advised the Debtor in extensive and varied settlement negotiations with Mortgagee since the Petition Date which ultimately brought about a resolution of the case and the Settlement Agreement which is principally drafted by CG.

31. For CG to fulfill its responsibilities to the Debtor and its creditors, it was necessary for CG to expend \$177,623.50 in time charges and \$19.05 in disbursements, for a total of \$177,642.55 calculated as follows:

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Total
Nicholas J. Kaiser	1983	147.7	\$795.00	\$117,421.50
Matthew V. Povolny	2007	34.5	\$725.00	\$25,012.50
Randall W. Bryer	2017	9.7	\$600.00	\$5,820.00
Christine M. Jordan	2017	47.0	\$600.00	\$28,200.00
Megan E. Polomene	N/A	2.9	\$300.00	\$870.00
Anthony Megliola	N/A	1.0	\$300.00	\$300.00
Disbursements				\$19.05
Grand Total		242.8		\$177,623.50

32. A schedule of time charges for the current period is annexed as Schedule A followed by the schedule from the prior interim application.

33. The breakdown of time charges for the current period follows:

Business Operations	2.0	\$ 1,590.00
Plan and Disclosure Statement (including Business Plan)	2.6	\$ 1,572.00
Settlement/Non-Binding ADR	65.50	\$42,006.50
	70.10	\$45,168.50

34. The breakdown of time charges copied from the prior interim application follows:

Asset Analysis and Recovery	1.4	\$1,113.00
Assumption/Rejection of Leases and Contracts	3.3	\$2,539.50
Business Operations	23.8	\$16,861.50
Other Contested Matters (excluding assumption/rejection motions)	76.0	\$50,276.50
Plan and Disclosure Statement (including Business Plan)	21.0	\$15,976.50
Settlement/Non-Binding ADR	59.8	\$45,688.50
	185.30	\$132,455.50

CONCLUSION

WHEREFORE, Applicant respectfully request that the fees and disbursements be awarded in the amounts requested herein, that the Debtor be authorized to pay that amount to the Applicant, and that the Court grant such other, further and different relief as is just and proper.

Dated: New York, New York
November 20, 2023

COHEN & GRESSER LLP
Attorneys for the Debtor

By: /s/ Nicholas J. Kaiser
800 Third Avenue
New York, New York 10022
(212) 957-7600

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

Debtor.

X

CERTIFICATE OF PROFESSIONAL

In accordance with the **Guidelines for Fees and Disbursements for Professionals In the EASTERN District of New York Bankruptcy Cases** (the “Guidelines”), Nicholas J. Kaiser, a member of the firm of Cohen & Gresser LLP, 800 Third Avenue, New York, New York 10022 (the “Applicant”), hereby certifies as follows:

1. I have read the foregoing Application for Interim Allowance of Compensation and Reimbursement of Expenses by Counsel for the Debtor (the “Application”).
2. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Amended Guidelines and the UST Guidelines for fee applications, except as specifically noted in this certification and described in the fee application.
3. Except to the extent that fees or disbursements are prohibited by these Amended Guidelines or the UST Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by the applicant and generally accepted by the applicant’s clients.

4. In providing a reimbursable service, the applicant does not make a profit on the service, whether the service is performed by the applicant in-house or through a third party.

5. The debtor has been provided with periodic statements of fees and disbursements accrued.

6. A list of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent by each professional and paraprofessional, a general description of services rendered, a reasonably detailed breakdown of the disbursements incurred and an explanation of billing practices is incorporated into the attached fee application. CG professionals and paraprofessionals providing services record their time contemporaneously on a daily basis in increments of one tenth of an hour with a description of the services formed.

7. The debtor has been provided with a copy of the relevant fee application at least 14 days before the date set by the court or any applicable rules for filing fee applications.

Dated: New York, New York
November 20, 2023

s/ Nicholas J. Kaiser

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re

Chapter 11

Outpost Pines, LLC

Case no. 23-70617

Debtor.

X

**ORDER GRANTING APPLICATION FOR ALLOWANCE
OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon the application (the “Application”) of Cohen & Gresser LLP (“CG”), attorneys for the Debtor, for allowance of interim compensation and reimbursement of expenses for professional services rendered and expenses incurred during this Chapter 11 case, and upon the hearing held before this Court on December __, 2023, and after due deliberation, and consideration sufficient cause appearing therefore, it is

ORDERED that the Application be, and it hereby is, granted to the extent set forth in the Schedule annexed hereto, and that the Debtor pay that amount.

Case No.: 23-70617

Case Name: Outpost Pines, LLC

Schedule A**INTERIM APPLICATION TOTALS**

Click here to enter text. through November

(1) Applicant	(2) Date/Document Number of Application	(3) Interim fees Requested on Application	(4) Fees Allowed	(5) Fees to be Paid for Current Fee Period	(7) Total Fees to be Paid	(8) Interim Expenses Requested	(9) Expenses to be Paid for Current Fee Period
Cohen & Gresser, LLP	November 20, 2023 Docket No. ____ Interim Application	45,168.50	45,168.50	45,168.50	45,168.50	\$19.05	\$19.05

Case No.: 23-70617

Case Name: Outpost Pines, LLC

Schedule B**FINAL APPLICATION TOTALS**

Click here to enter text. through November

(1) Applicant	(2) Total Fees Requested	(3) Total Fees to be Paid	(4) Total Expenses Requested	(5) Total Expenses to be Paid
Cohen & Gresser, LLP	177,623.50	177,623.50	\$19.05	19.05

Revised October 2011

DATE ON WHICH ORDER WAS SIGNED:

INITIALS: _____ USBJ

<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Value</u>
Business Operations				
10/30/23	NK Ongoing work re I Reisner review of matters concerning marketing and sales [2.0].	795.00	2.00	1,590.00
Plan and Disclosure Statement (Including Business Plan)				
10/23/23	NK Work re post hearing and order	795.00	0.70	556.50
10/25/23	NK Issues re final order including telephone conferences with M. Frankel and emails re same.	795.00	0.90	715.50
10/30/23	AM Docket pulling and distribution	300.00	1.00	300.00
Settlement/Non-binding ADR				
09/07/23	NK Telephone conference with R. McCord re settlement terms (0.4); emails re same (0.3); telephone conferences with PJ re same (0.8); telephone conferences with tel cons m Frankel re documenting, confidentiality and related (0.8).	795.00	2.30	1,828.50
09/08/23	MVP Review/analyze and draft/revise settlement agreement.	725.00	0.70	507.50
09/09/23	MVP [NO CHARGE] Review/analyze settlement agreement and communication with C. Jordan and N. Kaiser regarding same.	0.00	1.10	0.00
09/22/23	NK Telephone conference with R. Smolo ECap counsel re Deed in lieu documents.	795.00	0.40	318.00
09/25/23	NK Work re Moroff brokerage agreement revisions including telephone conferences with PJ and telephone conference with Muroff to finalize (1.5).	795.00	1.50	1,192.50
09/26/23	NK [NO CHARGE] Prepare fee application.	0.00	3.00	0.00
09/27/23	NK [NO CHARGE] Draft fee application.	0.00	3.00	0.00
NK	Telephone conferences and emails with PJ re Muroff retention, site visit and ancillary.	795.00	0.40	318.00

<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Value</u>
09/28/23				
NK	[NO CHARGE] Work on fee application (1.0)	0.00	1.00	0.00
NK	Extensive telephone conference with Ian re brokerage retention and sale matters.	795.00	0.80	636.00
10/01/23				
NK	Extensive conference with PJ re settlement and related matters (1.1); extensive telephone conference with Ian re same (1.2).	795.00	2.30	1,828.50
10/02/23				
NK	Conference with PJ re broker matters (0.4); review and mark up lease extension (1.0); review ECap deed-in-lieu agreement and consultation with foreclosure counsel and settlement agreement requirements (2.5).	795.00	3.90	3,100.50
10/03/23				
NK	Conference foreclosure counsel re deed in lieu agreement and related (0.6); complete revision of ECap draft deed-in-lieu agreement (4.9).	795.00	5.50	4,372.50
10/04/23				
NK	Extensive revisions to deed in lieu docs from ECap and distribute.	795.00	3.50	2,782.50
10/05/23				
NK	Ongoing work re deed-in-lieu agreement including telephone and email with title company; extensive conference with ECap counsel, bankruptcy and litigation aspects and revisions regarding same.	795.00	4.90	3,895.50
10/06/23				
NK	Extensive mark up deed in lieu Agreement and review with client (4.0); work re entity status (0.5).	795.00	4.50	3,577.50
10/08/23				
NK	Meeting with PJ re settlement and related.	795.00	1.00	795.00
10/10/23				
NK	Prep and extensive telephone conference with PR re deed-in-lieu agreement revisions.	795.00	2.50	1,987.50
10/11/23				
NK	Prep and extensive telephone conference with ECap legal group re deed-in-lieu comments and mark-up (1.4); issues re IP (0.7); review settlement agreement against deed-in-lieu agreement (1.0).	795.00	3.10	2,464.50
10/12/23				
NK	Work re deed-in-lieu agreement including communication with ECap counsel and PJ McAteer re IP and intangibles and related.	795.00	1.50	1,192.50
10/13/23				
NK	Extensive revisions to deed in lieu agreement.	795.00	2.50	1,987.50

<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Value</u>
10/14/23	NK Extensive telephone conference with R. McCord re possible objection to plan based upon deed in lieu (0.6); conference with client and emails re same (0.5).	795.00	1.10	874.50
10/15/23	NK Extensive telephone conference with M. Frankel re possible objection by ECap (0.6); TEL CON R McCord re same (0.5); review and distribute deed-in-lieu mark up to ECap group (0.9).	795.00	2.00	1,590.00
10/16/23	NK Finalize deed-in-lieu agreement with ECap counsel including 2 drafts of revisions.	795.00	3.50	2,782.50
10/19/23	NK Work re DIL agreement.	795.00	2.20	1,749.00
10/20/23	NK Work re deed in lieu agreement including emails and telephone conferences with PR and Rich McCord.	795.00	2.50	1,987.50
10/23/23	NK [NO CHARGE] Prep and attend plan hearing including travel.	0.00	4.50	0.00
	NK Deed in lieu work.	795.00	0.30	238.50

For Current Services Rendered \$45,168.50

Recapitulation				
Timekeeper	Hours	Rate	Total	
Nicholas Kaiser	55.80	795.00	44,361.00	
Matthew V. Povolny	0.70	725.00	507.50	
Anthony Megliola	1.00	300.00	300.00	<u>\$45,168.50</u>

DATE	ACTUAL TKPR	TASK	ACTUAL HOURS	RATE	AMOUNT	NARRATIVE
02/28/23	NK		0.40	795.00	318.00	Telephone conference with M. Frankel re filings, change to assume SBA loan, and related.
03/01/23	01 NK		1.00	795.00	795.00	Telephone conference and emails with M. Frankel re case matters and comments to docs (0.6); telephone conference with PJ re same (0.4).
03/08/23	01 NK		0.90	0.00	0.00	[NO CHARGE] Emails re B Howard lease; review and comment.
03/27/23	01 NK		1.50	0.00	0.00	[NO CHARGE] telephone conference with PJ to prep for creditor hearing; email M. Frankel re same; attend hearing; follow up with PJ re same.
04/05/23	01 NK		1.10	795.00	874.50	Extensive conference with PJ re substance of hearing and strategy, appraisal and 2023 season.
04/08/23	01 NK		1.70	795.00	1,351.50	Extensive conference with M. Frankel re lease matters (1.0); conference with M. Povolny re research of same (0.7).
04/10/23	01 MVP		0.70	725.00	507.50	Research regarding potential claims and communication with B. Bergman regarding same.
04/17/23	01 NK		1.30	795.00	1,033.50	Conference with M. Frankel re case matters and research (0.4); conference with M. Povolny re same (0.3); extensive telephone conference with PJ re settlement proposals and related (0.6).
04/18/23	01 MVP		1.70	725.00	1,232.50	Research regarding potential claims (1.0); draft/revise summary regarding same for N. Kaiser (0.7).
04/20/23	01 NK		2.00	795.00	1,590.00	Review e capital offer (0.4); extensive telephone conference with PJ re same (1.0); telephone conference with M. Frankel re same (0.3); conference with M.

Outpost Pines
Post-Petition time

					Povolny re research (0.3).
04/24/23	01 MVP	2.60	0.00	0.00	[NO CHARGE] Research regarding bankruptcy and potential claims; communications with B. Bregman and N. Kaiser regarding same.
04/24/23	01 NK	2.10	795.00	1,669.50	Prep and extensive conference with PJ, Kip and M. Frankel re settlement proposal to E Capital (1.10); emails (0.2); review spreadsheets re same (0.2); telephone conference with M. Frankel re same and strategy and lease canteen related (0.6).
04/25/23	01 NK	1.00	795.00	795.00	Extensive telephone conference with PJ re counteroffer to E capital (0.6); conference with M. Frankel re same (0.2); review and analysis (0.2).
05/06/23	01 NK	1.00	795.00	795.00	Prep and meeting with PJ and Kip re structure of offer back to lender, financing, and issues related to canteen bldg and meeting re 2023 season operations (1.0).
05/08/23	01 NK	0.70	795.00	556.50	Telephone conference with PJ re counteroffer to E Capital (0.4); review (0.3).
05/09/23	01 NK	1.50	795.00	1,192.50	Conference PJ, Kip and M Frankel re responsive offer to E Capital (1.0); review spread sheets re same (0.2); follow up PJ (no charge); telephone conference with M. Frankel re balloting (0.3).
05/10/23	01 NK	0.30	795.00	238.50	Emails re E Capital counteroffer.
05/11/23	01 NK	1.50	795.00	1,192.50	Ongoing and extensive conferences PJ re condemnation and related (1.1); update Ian re same (0.4).
05/13/23	01 NK	1.50	795.00	1,192.50	Issues re condemnation of motel and Brookhaven letters (0.4); telephone conference with M. Frankel re same and impact on case and strategy (0.4); extensive

Outpost Pines
Post-Petition time

					meeting with PJ re same, Canteen bldg matters, strategy, fund raising, business update and impact (0.7).
05/14/23	01 NK	2.00	795.00	1,590.00	Prep and extensive conference call with PJ, Kip and M Frankel re condemnation, settlement status and strategy, canteen building matters, settlement options, Plan hearing, alternatives and possible adjournment and prep for 5/15 E Capital call (1.4); follow up PJ (0.6).
05/15/23	01 NK	2.10	795.00	1,669.50	On going work re condemnation; telephone conference with M. Frankel, PJ and Kip re prep for negotiation session with E Capital re condemnation and Plan adjournment (0.7); participate in all parties zoom session (1.0); follow up telephone conference with PJ, Kip and M. Frankel re same and path forward (0.3); follow ups with PJ re E Capital counsel and related (0.1); update conference with I. Reisner (no charge).
05/17/23	01 NK	1.50	795.00	1,192.50	Ongoing work re condemnation and impact on Plan and real estate (1.0); telephone conference and emails with M. Frankel re E Capital and objections (0.3); telephone conference with PJ re strategy (0.2); update call with Ian (no charge).
05/18/23	01 NK	1.50	795.00	1,192.50	Review E Capital objection documents (0.5); telephone conference with M. Frankel re denial of adjournment and strategy (0.5); telephone conference with PJ re engineer, Brookhaven and related (0.5).
05/19/23	01 NK	0.50	795.00	397.50	Telephone conference with Frankel re hearing matters, boatel condemnation and impact and related.
05/22/23	01 NK	2.00	795.00	1,590.00	Review engineer report (0.5); telephone conference

Outpost Pines
Post-Petition time

					with PJ re same (0.5); telephone conference with M. Frankel re engineer report and condemnation and issues for 5/24 hearing (0.3); review and mark up submission to Court for 5/24 hearing (0.4); telephone conference with PJ re settlement and related (0.2).
05/23/23	01 NK	1.50	795.00	1,192.50	Extensive conference with M. Frankel re hearing prep and condemnation (1.0); telephone conference with PJ re same and operational related matters (0.5).
05/24/23	01 NK	1.30	0.00	0.00	[NO CHARGE] Prep and attend hearing.
05/24/23	01 NK	2.00	795.00	1,590.00	Conferences post-hearing re building inspector letter with PJ and M. Frankel (1.0); conference with M. Povolny re research for condemnation (0.4); telephone conference with PJ re strategy and real estate and related (0.6).
05/25/23	01 MVP	1.60	725.00	1,160.00	Legal research regarding condemnation issue and review/analyze case law regarding same.
05/25/23	01 NK	1.00	795.00	795.00	Work re insurance and letter from Brookhaven re access to general store (0.5); telephone conference with M. Frankel re same (0.3); meeting with PJ re same (0.2).
05/30/23	01 NK	1.00	0.00	0.00	[NO CHARGE] Conference with M. Povolny re condemnation procedure research per bankruptcy counsel's request; review memo re same.
05/31/23	01 MVP	0.60	725.00	435.00	Review/analyze Brookhaven Town Code and draft/revise summary for N. Kaiser.
05/31/23	01 NK	0.70	0.00	0.00	[NO CHARGE] Conference with M. Povolny re condemnation and statutory requirements; conference with M. Povolny re insurance policy review.

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Outpost Pines
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05/31/23	RWB	0.80	0.00	0.00	[NO CHARGE] Conference with M. Povolny to discuss insurance policy review project; reviewed insurance policies and summarized same.
06/01/23	MVP	0.80	725.00	580.00	Research and draft/revise memorandum regarding condemnation and procedural issues.
06/01/23	01 NK	0.90	795.00	715.50	Conference with M. Povolny re condemnation statutory procedure (0.3); review memo and distribute (0.3); email responses to M. Frankel re insurance (0.3).
06/01/23	01 RWB	4.60	600.00	2,760.00	Reviewed insurance policies and summarized same
06/02/23	NK	0.40	795.00	318.00	Review summary re insurance analysis.
06/02/23	01 RWB	1.60	600.00	960.00	Reviewed insurance policies and summarized same
06/06/23	RWB	3.00	600.00	1,800.00	Call with M. Povolny to discuss additional research questions regarding client's insurance policies (0.4); reviewed policies in connection with same and drafted answers (2.6).
06/07/23	RWB	0.50	600.00	300.00	Reviewed insurance policies in connection with questions from M. Povolny and drafted answers.
06/08/23	MVP	0.70	725.00	507.50	Review/analyze insurance coverage memorandum and materials.
06/09/23	01 MVP	0.90	725.00	652.50	Review/analyze insurance coverage analysis and communication with N. Kaiser regarding same.
06/09/23	01 NK	1.00	795.00	795.00	Work re insurance analysis (0.3); conference with M. Povolny re same (0.2); meeting with PJ re same and condemnation (0.5).
06/10/23	01 NK	1.00	795.00	795.00	Meeting with PJ re condemnation, subpoena and strategy, business review (0.7); telephone conference with Ian re subpoena and response

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					(0.3).
06/12/23	01 MVP	0.80	725.00	580.00	Review/analyze research memorandum regarding insurance coverage issues.
06/13/23	01 NK	0.90	795.00	715.50	Conference with M. Povolny re insurance and related (0.3); telephone conference with M. Frankel re subpoena and discovery and related (0.6).
06/14/23	01 NK	0.70	795.00	556.50	Emails with M. Frankel (0.1); extensive telephone conference with M. Frankel re motions by E Capital, strategy and counter offer scenarios (0.6).
06/16/23	01 MVP	1.30	725.00	942.50	Research and draft/revise memorandum regarding insurance coverage and condemnation.
06/16/23	01 MVP	0.80	725.00	580.00	Review/analyze subpoenas and communication with N. Kaiser regarding same.
06/17/23	01 CMJ	0.30	600.00	180.00	Participate in call with M. Povolny regarding subpoena responses.
06/17/23	MVP	0.20	725.00	145.00	Conference with C. Jordan regarding responses to subpoena.
06/18/23	01 MVP	0.40	725.00	290.00	Communications with C. Jordan regarding subpoena response.
06/19/23	01 CMJ	3.60	600.00	2,160.00	Draft Rule 2004 subpoena responses.
06/20/23	CMJ	2.70	600.00	1,620.00	Revise responses and objections to subpoenas and related call and correspondence with M. Povolny.
06/20/23	MVP	0.60	725.00	435.00	Review/analyze responses and objections to subpoena.
06/20/23	01 NK	0.60	795.00	477.00	Work re documents demand and responses (0.3); telephone conference with M. Frankel re same (0.3).
06/21/23	01 CMJ	0.30	600.00	180.00	Participate in calls with M. Povolny regarding next steps for subpoena response.

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06/21/23	CMJ	0.50	600.00	300.00	Correspondence with T. Powers and M. Polomene concerning McAteer document production details.
06/21/23	CMJ	0.50	600.00	300.00	Draft document production cover letter and related correspondence with M. Povolny.
06/21/23	CMJ	1.30	600.00	780.00	Perform document review on documents in scope for McAteer production.
06/21/23	CMJ	0.30	600.00	180.00	Revise McAteer subpoena responses following discussion with M. Povolny.
06/21/23	MVP	0.70	725.00	507.50	Draft/revise responses and objections to subpoena and communication with N. Kaiser and C. Jordan regarding same.
06/21/23	01 NK	0.50	795.00	397.50	Review subpoena responses (0.3); conference with M. Povolny re same (0.2).
06/22/23	01 CMJ	1.30	600.00	780.00	Review and finalize subpoena response for production.
06/22/23	CMJ	2.40	600.00	1,440.00	Revise and serve subpoena responses and objections and production cover letter and related.
06/22/23	MEP	0.80	300.00	240.00	Create and update document production; Correspondence with iManage team re production; prepare and deliver service mailing
06/22/23	MVP	3.70	725.00	2,682.50	Review/analyze responses and objections to subpoena and document production and communications with N. Kaiser, C. Jordan, and co-counsel regarding same.
06/22/23	01 NK	1.30	795.00	1,033.50	Work re subpoena and document production (0.4); telephone conference with M. Frankel re same (0.3); conferences with M. Povolny re same (0.2); review drafts (0.4).
06/23/23	01 CMJ	0.30	600.00	180.00	Correspondence with M. Povolny regarding deposition scheduling.

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06/23/23	MVP	0.80	725.00	580.00	Review/analyze case materials and plan/prepare for deposition defense.
06/26/23	01 CMJ	0.20	600.00	120.00	Participate in calls with M. Povolny re deposition prep.
06/26/23	CMJ	2.00	600.00	1,200.00	Analyze bankruptcy documents in connection with McAteer deposition and draft summary of key points.
06/26/23	MVP	1.30	725.00	942.50	Review/analyze case materials and plan and prepare for deposition.
06/26/23	01 NK	1.30	0.00	0.00	[NO CHARGE] Conferences with M. Povolny re litigation, entity representative depo and ancillary.
06/27/23	01 CMJ	1.00	600.00	600.00	Participate in call with M. Povolny and P. McAteer re deposition prep.
06/27/23	CMJ	0.20	600.00	120.00	Participate in call with M. Povolny re deposition prep.
06/27/23	CMJ	1.10	600.00	660.00	Call with N. Kaiser, M. Povolny, and M. Frenkel re next steps in bankruptcy.
06/27/23	CMJ	0.50	600.00	300.00	Correspondence regarding Governali deposition logistics.
06/27/23	CMJ	0.40	600.00	240.00	Coordinate preparation of McAteer deposition prep and exhibit binders with paralegal.
06/27/23	MEP	2.10	300.00	630.00	Prepare and edit binders for deposition
06/27/23	MVP	1.90	725.00	1,377.50	Review/analyze deposition exhibits and plan/prepare for deposition of PJ McAteer.
06/27/23	01 MVP	1.10	725.00	797.50	Conference call with PJ McAteer regarding deposition preparation.
06/27/23	01 MVP	1.00	725.00	725.00	Conference call with N. Kaiser and co-counsel regarding case status and strategic planning.
06/27/23	01 NK	2.20	795.00	1,749.00	Extensive conference with M Frankel re Plan status,

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					and strategy for 7/10 hearing and 7/3 documents (1.2); telephone conference with PJ re Plan matters and possible new offer (1.0).
06/27/23	01 NK	2.50	0.00	0.00	[NO CHARGE] Work re depos and prep.
06/28/23	01 CMJ	2.00	600.00	1,200.00	Prepare to participate in Gubernali deposition, including through review of noticing counsel's exhibits.
06/28/23	CMJ	0.10	600.00	60.00	Participate in call with M. Povolny re prep for Gubernali deposition.
06/28/23	CMJ	2.60	600.00	1,560.00	Participate in Gubernali deposition.
06/28/23	CMJ	2.00	600.00	1,200.00	Prepare summary and analysis of Gubernali deposition for N. Kaiser and M. Povolny.
06/28/23	CMJ	0.30	600.00	180.00	Correspondence with M. Povolny re exhibits for Gubernali deposition.
06/28/23	MVP	1.00	725.00	725.00	Review/analyze deposition transcript and communications with N. Kaiser and C. Jordan regarding same.
06/28/23	01 MVP	0.30	725.00	217.50	Communication with P. McAtee regarding deposition.
06/29/23	01 CMJ	0.30	600.00	180.00	Correspondence with co-counsel and opposing counsel concerning Reisner deposition.
06/29/23	CMJ	0.50	600.00	300.00	Prepare for Reisner deposition.
06/29/23	CMJ	0.10	600.00	60.00	Call with M. Povolny regarding McAtee deposition take-aways.
06/29/23	CMJ	1.40	600.00	840.00	Participate in Reisner deposition.
06/29/23	CMJ	0.40	600.00	240.00	Calls with N. Kaiser and M. Povolny regarding Reisner deposition take-aways.
06/29/23	CMJ	1.70	600.00	1,020.00	Draft summary of Reisner deposition.

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06/29/23	MVP	2.90	725.00	2,102.50	Appear for/attend Outpost Pines LLC/PJ McAtee examination.
06/29/23	01 MVP	1.20	725.00	870.00	Review/analyze deposition transcripts and communications with N. Kaiser and C. Jordan regarding same.
06/29/23	01 NK	2.00	0.00	0.00	[NO CHARGE]. Conference with M. Povolny re depositions; review summaries.
06/30/23	01 MVP	1.10	725.00	797.50	Review/analyze transcripts from depositions and communications with N. Kaiser and co-counsel regarding same.
06/30/23	01 NK	1.00	795.00	795.00	Extensive conference with C. Jordan re Ian depo and related (0.5); conference with M. Povolny re privilege matters and Reisner as manager of all debtor related entities (0.5).
07/01/23	01 NK	1.60	795.00	1,272.00	Prep and extensive telephone conference with PJ re strategy and case matters (1.1); telephone conference with M. Frankel re same (0.5).
07/02/23	01 MVP	1.10	725.00	797.50	Review/analyze objection to motion for conversion and communications with co-counsel regarding same.
07/02/23	01 NK	1.20	795.00	954.00	Telephone conference with PJ and Kip re plan and related (0.7); review and comment answer draft due 7/3 (0.5).
07/03/23	01 MVP	0.70	725.00	507.50	Review/analyze revised objection to motion for conversion and communication with co-counsel regarding same.
07/05/23	01 MVP	1.10	725.00	797.50	Review/analyze draft declaration for confirmation hearing and communication with N. Kaiser regarding same.
07/05/23	01 NK	0.70	795.00	556.50	Telephone conference with M Frankel re 7/10 hearing and related (0.3); telephone

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					conference with PJ re same and settlement options (0.4).
07/06/23	01 MVP	1.30	725.00	942.50	Review/analyze ECapital's reply and draft/revise declaration regarding confirmation hearing.
07/07/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Attend to case correspondence and case files.
07/07/23	MVP	0.30	725.00	217.50	Review/analyze ECapital's reply and communication with bankruptcy counsel regarding same.
07/07/23	01 NK	3.00	795.00	2,385.00	Review PJ affidavit (0.3); emails and telephone conferences with M. Frankel (0.4); extensive telephone conference with PJ re 7/11 hearing and case strategy (1.0); extensive telephone conference with M. Frankel re same (0.5); extensive telephone conference with PJ and M. Frankel re settlement options and strategy (0.8).
07/10/23	01 NK	5.00	0.00	0.00	[NO CHARGE] Travel to, prep with client and M Frankel; attend Islip Hearing and settlement meeting with E Cap; return to NYC.
07/11/23	01 MVP	0.40	725.00	290.00	Review/analyze reply to objection by ECapital.
07/12/23	01 NK	1.00	795.00	795.00	Prep and settlement call with clients, M Frankel and ECap and counsel and US Trustee.
07/19/23	01 NK	0.70	795.00	556.50	Draft confidentiality agreement for brokers (0.5); telephone conference with M. Frankel re nondisclosure aspects (0.2).
07/24/23	01 MVP	0.30	725.00	217.50	Review/analyze examination transcript and communication with client regarding same.
07/25/23	01 NK	1.00	795.00	795.00	Meeting with PJ re bankruptcy, settlement options, and related.
07/29/23	01 NK	0.80	795.00	636.00	Email response from McCord re appraisal (0.1),

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					follow up settlement call and related (0.3); extensive telephone conference with PJ re same (0.4).
08/01/23	01 CMJ	0.20	600.00	120.00	Correspondence with M. Povolny and P. McAteer (Outpost Pines) re deposition follow up.
08/01/23	CMJ	1.00	600.00	600.00	Review McAteer deposition transcript and prepare errata sheet.
08/02/23	CMJ	5.30	600.00	3,180.00	Review McAteer deposition transcript and prepare errata sheet and related correspondence with M. Povolny.
08/03/23	CMJ	0.30	600.00	180.00	Correspondence with client re deposition follow-up.
08/03/23	NK	1.00	795.00	795.00	Meeting with PJ re case matters and strategy.
08/06/23	01 MVP	0.50	725.00	362.50	Research regarding lease obligations and communication with N. Kaiser regarding same.
08/07/23	01 NK	3.00	795.00	2,385.00	Prep and meeting with PJ and Kip (1.0); all hands settlement conference with E Cap and counsel, PJ, KIP, and M Frankel (1.3); follow-up post-settlement meeting with PJ and Kip (0.4); questions from PJ and Kip re errata sheet and depo questions (0.3).
08/07/23	01 NK	0.40	795.00	318.00	Conference with M. Povolny re canteen lease end of term aspects.
08/08/23	01 NK	0.60	795.00	477.00	Extensive telephone conference with M. Frankel re broker, plan amendment and ancillary (0.6).
08/09/23	01 NK	0.90	795.00	715.50	Telephone conference with PJ re brokers, interviews and related (0.3); telephone conference with M. Frankel re case matters for Sept 11 hearing including strategy and broker retention (0.6).
08/11/23	01 NK	1.00	795.00	795.00	Telephone conference with R. McCord re details of Ecapital proposal re

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					brokered sale. (0.4); telephone conference with M. Frankel re same and strategy for responsive proposal (0.6).
08/14/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Correspondence with P. McAteer concerning errata sheet.
08/14/23	NK	1.80	795.00	1,431.00	Prep and meeting with PJ and Kip re ECapital sale process proposal and outpost counter options and strategy (1.5) summary of counter offer (0.3).
08/17/23	01 NK	1.70	795.00	1,351.50	Review notes for plan amendment proposal (0.2); draft term sheet for plan amendment proposals (1.5).
08/19/23	01 NK	1.60	795.00	1,272.00	Meeting with PJ re proposal for amended bankruptcy plan and asset sale (1.0); operations review with PJ (0.3); conference with PJ re depo wreath sheet (0.3).
08/21/23	01 NK	1.30	795.00	1,033.50	Draft term sheet for Plan Amendment.
08/22/23	01 NK	1.50	795.00	1,192.50	Emails re term sheet for Plan amendment (0.3); emails M. Frankle re revisions to term sheet (0.4); telephone conference with PJ re comments to term sheet (0.5); revise term sheet and distribute to ECAP counsel (0.7).
08/23/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Participate in call with N. Kaiser re edits to and next steps for errata sheet.
08/23/23	CMJ	0.40	600.00	240.00	Revise errata sheet with client feedback and related correspondence with paralegal.
08/24/23	CMJ	0.40	0.00	0.00	[NO CHARGE] Finalize draft errata sheet with client comments and paralegal revisions.
08/24/23	MVP	0.30	0.00	0.00	[NO CHARGE] Review/analyze proposed errata sheet and transcript.
	01				

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08/24/23	NK	1.70	795.00	1,351.50	Receipt and review ECAP sale proposal (0.4); extensive telephone conference with R. McCord re same (0.6); email analysis to McCord re same (0.5) emails client group (0.2).
08/25/23	01 NK	1.40	795.00	1,113.00	Telephone conference with R. McCord re motel rehab and logistics and Ecaps demands re same (0.4); meeting with PJ and Kip re same and settlement proposal alternatives (1.0).
08/28/23	01 NK	1.00	795.00	795.00	Meeting with PJ and Kip re case matters and proposal to settle with Ecap (1.0).
08/30/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Follow-up with client re errata sheet.
08/30/23	NK	0.70	795.00	556.50	Emails with R. McCord (0.3); work re settlement proposal (0.4).
08/31/23	01 NK	1.70	795.00	1,351.50	Review ECap motion to deny extension of exclusivity (0.3); telephone conference with M. Frankel re settlement proposal and strategy update (0.6); telephone conference with PJ re Same (0.5); draft updated proposal (0.3).
09/01/23	01 NK	1.20	795.00	954.00	Meeting with PJ re settlement proposal (0.9); revise proposal and distribute (0.3).
09/03/23	01 NK	0.80	795.00	636.00	Telephone conference with R. McCord re closing expenses and sale proposal (0.5); follow up PJ re same (0.3).
09/05/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Correspondence with M. Povolny regarding errata sheet next steps.
09/06/23	CMJ	0.20	0.00	0.00	[NO CHARGE] Participate in calls with M. Povolny regarding errata sheet and settlement agreement prep.
09/06/23	CMJ	0.30	600.00	180.00	Participate in call with N. Kaiser re settlement agreement prep (0.3).

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09/06/23	CMJ	0.10	0.00	0.00	[NO CHARGE] Correspondence with M. Povolny and PJ McAteer (Outpost Pines) re errata sheet.
09/06/23	NK	3.50	795.00	2,782.50	Telephone conference with R. McCORD re ecap counteroffer (0.6); telephone conference with PJ re same and formulation of response / strategy (0.7); telephone conference with M. Frankel re same (0.4); summary email from ecap re terms (0.4); telephone conference with M. Frankel re next steps, adjournment and amended plan (0.8); conference with M Povolny and c Jordan re settlement agreement drafting (0.6).
09/07/23	CMJ	01 4.70	600.00	2,820.00	Draft settlement agreement.
09/08/23	CMJ	0.30	600.00	180.00	Participate in call with N. Kaiser regarding draft settlement.
09/08/23	CMJ	2.50	600.00	1,500.00	Revise settlement with N. Kaiser comments and related correspondence with N. Kaiser and M. Povolny.
09/08/23	NK	1.50	795.00	1,192.50	Work re settlement agreement.
09/09/23	CMJ	01 0.70	600.00	420.00	Revise settlement agreement with comments from N. Kaiser and client.
09/09/23	NK	1.50	795.00	1,192.50	Work re settlement agreement and distribute.
09/10/23	NK	01 3.00	795.00	2,385.00	Extensive meeting with PJ re settlement agreement, Sale process and ancillary (2.0); meeting with Ian Reisner re same (1.0).
09/12/23	CMJ	01 0.20	0.00	0.00	[NO CHARGE] Correspondence with N. Kaiser and M. Povolny regarding errata sheet submission.
09/13/23	NK	1.40	795.00	1,113.00	Receipt and review ECap's proposed revisions to settlement agreement (0.5); review emails of settlement terms (0.3); revise settlement agreement (0.6).

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09/14/23	01 CMJ	0.50	600.00	300.00	Revise latest draft settlement agreement and related correspondence with M. Povolny and N. Kaiser.
09/14/23	NK	1.80	795.00	1,431.00	Revise settlement agreement (1.0); telephone conference with M. Frankel re same and procedural matters (0.4); telephone conference with PJ re settlement agreement (0.4).
09/15/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Participate in call with M. Povolny re settlement.
09/15/23	CMJ	0.50	600.00	300.00	Analyze revised draft settlement agreement.
09/15/23	NK	1.40	795.00	1,113.00	Meeting with PJ re possible settlement and related (0.5); review revised draft settlement agreement w ECap (0.5); conference with PJ re same (0.4).
09/16/23	01 NK	0.80	795.00	636.00	Meeting with PJ re settlement agreement and related (0.6); emails R. McCord re same (0.2).
09/18/23	01 NK	6.00	0.00	0.00	[NO CHARGE] Travel to and from and attend Bankruptcy Court hearing in Islip.
09/18/23	01 NK	1.00	795.00	795.00	Follow ups with PJ re exit process (0.5); telephone conference with M. Frankel re same and broker retention process (0.5).
09/20/23	01 NK	0.60	795.00	477.00	Review and comment amended plan (0.6).
09/21/23	01 NK	0.40	795.00	318.00	Telephone conference with R. Smolo ECap counsel re Deed in lieu docs (0.4).
		185.30		\$132,455.00	

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Cohen & Gresser LLP

Time Entries Sorted by Category
Matter: Outpost Pines LLC

DATE	ACTUAL TKPR	TASK	ACTUAL HOURS	RATE	AMOUNT	NARRATIVE
A-Asset Analysis & Recovery						
02/28/23	NK		0.40	795.00	318.00	Telephone conference with M. Frankel re filings, change to assume SBA loan, and related.
03/01/23	01 NK		1.00	795.00	795.00	Telephone conference and emails with M. Frankel re case matters and comments to docs (0.6); telephone conference with PJ re same (0.4).
Asset Analysis and Recovery						1.40
\$ 1,113.00						
Assumption /Rejection of Leases & Contracts						
04/08/23	NK		1.70	795.00	1,351.50	Extensive conference with M. Frankel re lease matters (1.0); conference with M. Povolny re research of same (0.7).
04/10/23	01 MVP		0.70	725.00	507.50	Research regarding potential claims and communication with B. Bergman regarding same.
08/06/23	01 MVP		0.50	725.00	362.50	Research regarding lease obligations and communication with N. Kaiser regarding same.
08/07/23	01 NK		0.40	795.00	318.00	Conference with M. Povolny re canteen lease end of term aspects.
Assumption/Rejection of Leases and Contracts						3.3
\$ 2,539.50						

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Business Operations					
05/11/23	NK	1.50	795.00	1,192.50	Ongoing and extensive conferences PJ re condemnation and related (1.1); update Ian re same (0.4).
5/13/23	NK	1.50	795.00	1,192.50	Issues re condemnation of motel and Brookhaven letters (0.4); telephone conference with M. Frankel re same and impact on case and strategy (0.4); extensive meeting with PJ re same, Canteen bldg matters, strategy, fund raising, business update and impact (0.7).
05/15/23	01 NK	2.10	795.00	1,669.50	On going work re condemnation; telephone conference with M. Frankel, PJ and Kip re prep for negotiation session with E Capital re condemnation and Plan adjournment (0.7); participate in all parties zoom session (1.0); follow up telephone conference with PJ, Kip and M. Frankel re same and path forward (0.3); follow ups with PJ re E Capital counsel and related (0.1); update conference with I. Reisner (no charge).
05/17/23	01 NK	1.50	795.00	1192.50	Ongoing work re condemnation and impact on Plan and real estate (1.0); telephone conference and emails with M. Frankel re E Capital and objections (0.3); telephone conference with PJ re strategy (0.2); update call with Ian (no charge).
05/25/23	01 NK	1.00	795.00	795.00	Work re insurance and letter from Brookhaven re access to general store (0.5); telephone conference with M. Frankel re same (0.3);

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					meeting with PJ re same (0.2).
06/01/23	01 RWB	4.60	600.00	2,760.00	Reviewed insurance policies and summarized same
06/02/23	NK	0.40	795.00	318.00	Review summary re insurance analysis.
06/02/23	01 RWB	1.60	600.00	960.00	Reviewed insurance policies and summarized same
06/06/23	RWB	3.00	600.00	1,800.00	Call with M. Povolny to discuss additional research questions regarding client's insurance policies (0.4); reviewed policies in connection with same and drafted answers (2.6).
06/07/23	RWB	0.50	600.00	300.00	Reviewed insurance policies in connection with questions from M. Povolny and drafted answers.
06/08/23	MVP	0.70	725.00	507.50	Review/analyze insurance coverage memorandum and materials.
06/09/23	01 MVP	0.90	725.00	652.50	Review/analyze insurance coverage analysis and communication with N. Kaiser regarding same.
06/09/23	01 NK	1.00	795.00	795.00	Work re insurance analysis (0.3); conference with M. Povolny re same (0.2); meeting with PJ re same and condemnation (0.5).
06/12/23	01 MVP	0.80	725.00	580.00	Review/analyze research memorandum regarding insurance coverage issues.
07/19/23	01 NK	0.70	795.00	556.50	Draft confidentiality agreement for brokers (0.5); telephone conference with M. Frankel re nondisclosure aspects (0.2).

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08/03/23	NK	1.00	795.00	795.00	Meeting with PJ re case matters and strategy.
09/18/23	01 NK	1.00	795.00	795.00	Follow ups with PJ re exit process (0.5); telephone conference with M. Frankel re same and broker retention process (0.5).

Business Operations **23.8** **\$ 16,861.50**

Other Contested Matters (excluding assumption /rejection motions)					
05/18/23	NK	1.50	795.00	1,192.50	Review E Capital objection documents (0.5); telephone conference with M. Frankel re denial of adjournment and strategy (0.5); telephone conference with PJ re engineer, Brookhaven and related (0.5).
05/19/23	01 NK	0.50	795.00	397.50	Telephone conference with Frankel re hearing matters, boatel condemnation and impact and related.
05/22/23	01 NK	2.00	795.00	1,590.00	Review engineer report (0.5); telephone conference with PJ re same (0.5); telephone conference with M. Frankel re engineer report and condemnation and issues for 5/24 hearing (0.3); review and mark up submission to Court for 5/24 hearing (0.4); telephone conference with PJ re settlement and related (0.3).
05/23/23	NK	1.50	795.00	1,192.50	Extensive conference with M. Frankel re hearing prep and condemnation (1.0); telephone conference with PJ re same and operational related matters (0.5).
05/24/23	01 NK	2.00	795.00	1,590.00	Conferences post-hearing re building inspector letter with PJ and M. Frankel (1.0); conference with M. Povolny re research for condemnation (0.4); telephone conference

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					with PJ re strategy and real estate and related (0.6).
05/25/23	01 MVP	1.60	725.00	1,160.00	Legal research regarding condemnation issue and review/analyze case law regarding same.
05/31/23	MVP	0.60	725.00	435.00	Review/analyze Brookhaven Town Code and draft/revise summary for N. Kaiser.
06/01/23	MVP	0.80	725.00	580.00	Research and draft/revise memorandum regarding condemnation and procedural issues.
06/01/23	01 NK	0.90	795.00	715.50	Conference with M. Povolny re condemnation statutory procedure (0.3); review memo and distribute (0.3); email responses to M. Frankel re insurance (0.3).
06/10/23	01 NK	1.00	795.00	795.00	Meeting with PJ re condemnation, subpoena and strategy, business review (0.7); telephone conference with Ian re subpoena and response (0.3).
06/13/23	01 NK	0.90	795.00	715.50	Conference with M. Povolny re insurance and related (0.3); telephone conference with M. Frankel re subpoena and discovery and related (0.6).
06/16/23	01 MVP	0.80	725.00	580.00	Review/analyze subpoenas and communication with N. Kaiser regarding same.
06/17/23	01 CMJ	0.30	600.00	180.00	Participate in call with M. Polvony regarding subpoena responses.
06/17/23	01 MVP	0.20	725.00	145.00	Conference with C. Jordan regarding responses to subpoena.
06/18/23	01 MVP	0.40	725.00	290.00	Communications with C. Jordan regarding subpoena response.
06/19/23	01 CMJ	3.60	600.00	2,160.00	Draft Rule 2004 subpoena responses.
06/20/23	01 CMJ	2.70	600.00	1,620.00	Revise responses and objections to subpoenas and related call and correspondence with M. Povolny.
06/20/23	MVP	0.60	725.00	435.00	Review/analyze responses

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					and objections to subpoena.
06/20/23	01 NK	0.60	795.00	477.00	Work re documents demand and responses (0.3); telephone conference with M. Frankel re same (0.3).
06/21/23	01 CMJ	0.30	600.00	180.00	Participate in calls with M. Povolny regarding next steps for subpoena response.
06/21/23	01 CMJ	0.50	600.00	300.00	Correspondence with T. Powers and M. Polomene concerning McAteer document production details.
06/21/23	01 CMJ	0.50	600.00	300.00	Draft document production cover letter and related correspondence with M. Povolny.
06/21/23	01 CMJ	1.30	600.00	780.00	Perform document review on documents in scope for McAteer production.
06/21/23	01 CMJ	0.30	600.00	180.00	Revise McAteer subpoena responses following discussion with M. Povolny.
06/21/23	01 MVP	0.70	725.00	507.50	Draft/revise responses and objections to subpoena and communication with N. Kaiser and C. Jordan regarding same.
06/21/23	01 NK	0.50	795.00	397.50	Review subpoena responses (0.3); conference with M. Povolny re same (0.2).
06/22/23	01 CMJ	1.30	600.00	780.00	Review and finalize subpoena response for production.
06/22/23	01 CMJ	2.40	600.00	1,440.00	Revise and serve subpoena responses and objections and production cover letter and related.
06/22/23	01 MEP	0.80	300.00	240.00	Create and update document production; Correspondence with iManage team re production; prepare and deliver service mailing
06/22/23	01 MVP	3.70	725.00	2,682.50	Review/analyze responses and objections to subpoena and document production and communications with N. Kaiser, C. Jordan, and co-counsel regarding same.
06/22/23	01 NK	1.30	795.00	1,033.50	Work re subpoena and document production (0.4);

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					telephone conference with M. Frankel re same (0.3); conferences with M. Povolny re same (0.2); review drafts (0.4).
06/23/23	01 CMJ	0.30	600.00	180.00	Correspondence with M. Povolny regarding deposition scheduling.
06/23/23	MVP	0.80	725.00	580.00	Review/analyze case materials and plan/prepare for deposition defense.
06/26/23	01 CMJ	0.20	600.00	120.00	Participate in calls with M. Povolny re deposition prep.
06/26/23	CMJ	2.00	600.00	1,200.00	Analyze bankruptcy documents in connection with McAteer deposition and draft summary of key points.
06/26/23	MVP	1.30	725.00	942.50	Review/analyze case materials and plan and prepare for deposition.
06/27/23	01 CMJ	1.00	600.00	600.00	Participate in call with M. Povolny and P. McAteer re deposition prep.
06/27/23	CMJ	0.20	600.00	120.00	Participate in call with M. Povolny re deposition prep.
06/27/23	CMJ	0.50	600.00	300.00	Correspondence regarding Gubernali deposition logistics.
06/27/23	CMJ	0.40	600.00	240.00	Coordinate preparation of McAteer deposition prep and exhibit binders with paralegal.
06/27/23	MEP	2.10	300.00	630.00	Prepare and edit binders for deposition
06/27/23	MVP	1.90	725.00	1,377.50	Review/analyze deposition exhibits and plan/prepare for deposition of PJ McAteer.
06/27/23	01 MVP	1.10	725.00	797.50	Conference call with PJ McAteer regarding deposition preparation.
06/28/23	01 CMJ	2.00	600.00	1,200.00	Prepare to participate in Gubernali deposition, including through review of noticing counsel's exhibits.
06/28/23	CMJ	0.10	600.00	60.00	Participate in call with M. Povolny re prep for Gubernali deposition.
06/28/23	CMJ	2.60	600.00	1,560.00	Participate in Gubernali

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					deposition.
06/28/23	CMJ	2.00	600.00	1,200.00	Prepare summary and analysis of Governali deposition for N. Kaiser and M. Povolny.
06/28/23	CMJ	0.30	600.00	180.00	Correspondence with M. Povolny re exhibits for Governali deposition.
06/28/23	MVP	1.00	725.00	725.00	Review/analyze deposition transcript and communications with N. Kaiser and C. Jordan regarding same.
06/28/23	01 MVP	0.30	725.00	217.50	Communication with P. McAteer regarding deposition.
06/29/23	01 CMJ	0.30	600.00	180.00	Correspondence with co-counsel and opposing counsel concerning Reisner deposition.
06/29/23	CMJ	0.50	600.00	300.00	Prepare for Reisner deposition.
06/29/23	CMJ	0.10	600.00	60.00	Call with M. Povolny regarding McAteer deposition take-aways.
06/29/23	CMJ	1.40	600.00	840.00	Participate in Reisner deposition.
06/29/23	CMJ	0.40	600.00	240.00	Calls with N. Kaiser and M. Povolny regarding Reisner deposition take-aways.
06/29/23	CMJ	1.70	600.00	1,020.00	Draft summary of Reisner deposition.
06/29/23	MVP	2.90	725.00	2,102.50	Appear for/attend Outpost Pines LLC/PJ McAteer examination.
06/29/23	01 MVP	1.20	725.00	870.00	Review/analyze deposition transcripts and communications with N. Kaiser and C. Jordan regarding same.
06/30/23	MVP	1.10	725.00	797.50	Review/analyze transcripts from depositions and communications with N. Kaiser and co-counsel regarding same.
06/30/23	01 NK	1.00	795.00	795.00	Extensive conference with C. Jordan re Ian depo and related (0.5); conference with M. Povolny re privilege matters

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					and Reisner as manager of all debtor related entities (0.5).
07/11/23	01 MVP	0.40	725.00	290.00	Review/analyze reply to objection by ECapital.
07/24/23	01 MVP	0.30	725.00	217.50	Review/analyze examination transcript and communication with client regarding same.
08/01/23	01 CMJ	0.20	600.00	120.00	Correspondence with M. Povolny and P. McAtee (Outpost Pines) re deposition follow up.
08/01/23	CMJ	1.00	600.00	600.00	Review McAtee deposition transcript and prepare errata sheet.
08/02/23	CMJ	5.30	600.00	3,180.00	Review McAtee deposition transcript and prepare errata sheet and related correspondence with M. Povolny.
08/03/23	01 CMJ	0.30	600.00	180.00	Correspondence with client re deposition follow-up.
08/23/23	01 CMJ	0.40	600.00	240.00	Revise errata sheet with client feedback and related correspondence with paralegal.
Other Contested Matters (excluding assumption/rejection motions)				76.0	\$50,276.50

Plan & Disclosure Statement (inc. Business Plan)					
04/05/23	NK	1.10	795.00	874.50	Extensive conference with PJ re substance of hearing and strategy, appraisal and 2023 season.
04/17/23	01 NK	1.30	795.00	1,033.50	Conference with M. Frankel re case matters and research (0.4); conference with M. Povolny re same (0.3); extensive telephone conference with PJ re settlement proposals and related (0.6).
04/18/23	01 MVP	1.70	725.00	1,232.50	Research regarding potential claims (1.0); draft/revise summary regarding same for N. Kaiser (0.7).

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06/27/23	01 CMJ	1.10	600.00	660.00	Call with N. Kaiser, M. Povolny, and M. Frenkel re next steps in bankruptcy.
06/27/23	01 MVP	1.00	725.00	725.00	Conference call with N. Kaiser and co-counsel regarding case status and strategic planning.
06/27/23	01 NK	2.20	795.00	1,749.00	Extensive conference with M Frankel re Plan status, and strategy for 7/10 hearing and 7/3 documents (1.2); telephone conference with PJ re Plan matters and possible new offer (1.0).
07/01/23	01 NK	1.60	795.00	1,272.00	Prep and extensive telephone conference with PJ re strategy and case matters (1.1); telephone conference with M. Frankel re same (0.5).
07/02/23	01 MVP	1.10	725.00	797.50	Review/analyze objection to motion for conversion and communications with co-counsel regarding same.
07/02/23	01 NK	1.20	795.00	954.00	Telephone conference with PJ and Kip re plan and related (0.7); review and comment answer draft due 7/3 (0.5).
07/03/23	MVP	0.70	725.00	507.50	Review/analyze revised objection to motion for conversion and communication with co-counsel regarding same.
07/05/23	01 MVP	1.10	725.00	797.50	Review/analyze draft declaration for confirmation hearing and communication with N. Kaiser regarding same.
07/05/23	01 NK	0.70	795.00	556.50	Telephone conference with M Frankel re 7/10 hearing and related (0.3); telephone conference with PJ re same and settlement options (0.4).
07/06/23	01 MVP	1.30	725.00	942.50	Review/analyze ECapital's reply and draft/revise declaration regarding confirmation hearing.
07/07/23	01 MVP	0.30	725.00	217.50	Review/analyze ECapital's reply and communication with bankruptcy counsel regarding same.

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08/08/23	NK	0.60	795.00	477.00	Extensive telephone conference with M. Frankel re broker, plan amendment and ancillary (0.6).
08/17/23	01 NK	1.70	795.00	1,351.50	Review notes for plan amendment proposal (0.2); draft term sheet for plan amendment proposals (1.5).
08/31/23	01 NK	1.70	795.00	1,351.50	Review ECap motion to deny extension of exclusivity (0.3); telephone conference with M. Frankel re settlement proposal and strategy update (0.6); telephone conference with PJ re Same (0.5); draft updated proposal (0.3).
09/20/23	01 NK	0.60	795.00	477.00	Review and comment amended plan (0.6).

Plan and Disclosure Statement (including Business Plan) 21.0 \$15,976.50

**Settlement/
Non-
Binding
ADR**

04/20/23	NK	2.00	795.00	1,590.00	Review e capital offer (0.4); extensive telephone conference with PJ re same (1.0); telephone conference with M. Frankel re same (0.3); conference with M. Povolny re research (0.3).
04/24/23	01 NK	2.10	795.00	1,669.50	Prep and extensive conference with PJ, Kip and M. Frankel re settlement proposal to E Capital (1.10); emails (0.2); review spreadsheets re same (0.2); telephone conference with M. Frankel re same and strategy and lease canteen related (0.6).
04/25/23	01 NK	1.00	795.00	795.00	Extensive telephone conference with PJ re counteroffer to E capital (0.6); conference with M. Frankel re same (0.2); review and analysis (0.2).
05/06/23	01 NK	1.00	795.00	795.00	Prep and meeting with PJ and Kip re structure of offer back to lender, financing, and issues related to canteen bldg and meeting re 2023 season operations (1.0).

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05/08/23	NK	0.70	795.00	556.50	Telephone conference with PJ re counteroffer to E Capital (0.4); review (0.3).
05/09/23	01 NK	1.50	795.00	1,192.50	Conference PJ, Kip and M Frankel re responsive offer to E Capital (1.0); review spread sheets re same (0.2); follow up PJ (no charge); telephone conference with M. Frankel re balloting (0.3).
05/10/23	01 NK	0.30	795.00	238.50	Emails re E Capital counteroffer.
05/14/23	01 NK		2.00	795.00	Prep and extensive conference call with PJ, Kip and M Frankel re condemnation, settlement status and strategy, canteen building matters, settlement options, Plan hearing, alternatives and possible adjournment and prep for 5/15 E Capital call (1.4); follow up PJ (0.6).
06/14/23	01 NK	0.70	795.00	556.50	Emails with M. Frankel (0.1); extensive telephone conference with M. Frankel re motions by E Capital, strategy and counter offer scenarios (0.6).
07/07/23	01 NK	3.00	795.00	2,385.00	Review PJ affidavit (0.3); emails and telephone conferences with M. Frankel (0.4); extensive telephone conference with PJ re 7/11 hearing and case strategy (1.0); extensive telephone conference with M. Frankel re same (0.5); extensive telephone conference with PJ and M. Frankel re settlement options and strategy (0.8).
07/12/23	01 NK	1.00	795.00	795.00	Prep and settlement call with clients, M Frankel and ECap and counsel and US Trustee.
07/25/23	01 NK	1.00	795.00	795.00	Meeting with PJ re bankruptcy, settlement options, and related.
07/29/23	01 NK	0.80	795.00	636.00	Email response from McCord re appraisal (0.1), follow up settlement call and related (0.3); extensive telephone conference with PJ re same (0.4).
08/07/23	01 NK	3.00	795.00	2,385.00	Prep and meeting with PJ and

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					Kip (1.0); all hands settlement conference with E Cap and counsel, PJ, KIP, and M Frankel (1.3); follow-up post-settlement meeting with PJ and Kip (0.4); questions from PJ and Kip re errata sheet and depo questions (0.3).
08/09/23	01 NK	0.90	795.00	715.50	Telephone conference with PJ re brokers, interviews and related (0.3); telephone conference with M. Frankel re case matters for Sept 11 hearing including strategy and broker retention (0.6).
08/11/23	01 NK	1.00	795.00	795.00	Telephone conference with R. McCord re details of Ecapital proposal re brokered sale. (0.4); telephone conference with M. Frankel re same and strategy for responsive proposal (0.6).
08/14/23	NK	1.80	795.00	1,431.00	Prep and meeting with PJ and Kip re ECapital sale process proposal and outpost counter options and strategy (1.5) summary of counter offer (0.3).
08/19/23	01 NK	1.60	795.00	1,272.00	Meeting with PJ re proposal for amended bankruptcy plan and asset sale (1.0); operations review with PJ (0.3); conference with PJ re depo wreath sheet (0.3).
08/21/23	01 NK	1.30	795.00	1,033.50	Draft term sheet for Plan Amendment.
08/22/23	01 NK	1.50	795.00	1,192.50	Emails re term sheet for Plan amendment (0.3); emails M. Frankle re revisions to term sheet (0.4); telephone conference with PJ re comments to term sheet (0.5); revise term sheet and distribute to ECAP counsel (0.3).
08/24/23	NK	1.70	795.00	1,351.50	Receipt and review ECAP sale proposal (0.4); extensive telephone conference with R. McCord re same (0.6); email analysis to McCord re same (0.5) emails client group (0.2).
08/25/23	01 NK	1.40	795.00	1,113.00	Telephone conference with R. McCord re motel rehab and

Outpost Pines
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					logistics and Ecaps demands re same (0.4); meeting with PJ and Kip re same and settlement proposal alternatives (1.0).
08/28/23	01 NK	1.00	795.00	795.00	Meeting with PJ and Kip re case matters and proposal to settle with Ecaps (1.0).
08/30/23	NK	0.70	795.00	556.50	Emails with R. McCord (0.3); work re settlement proposal (0.4).
09/01/23	01 NK	1.20	795.00	954.00	Meeting with PJ re settlement proposal (0.9); revise proposal and distribute (0.3).
09/03/23	01 NK	0.80	795.00	636.00	Telephone conference with R. McCord re closing expenses and sale proposal (0.5); follow up PJ re same (0.3).
09/06/23	01 CMJ	0.30	600.00	180.00	Participate in call with N. Kaiser re settlement agreement prep (0.3).
09/06/23	NK	3.50	795.00	2,782.50	Telephone conference with R. McCORD re ecaps counteroffer (0.6); telephone conference with PJ re same and formulation of response / strategy (0.7); telephone conference with M. Frankel re same (0.4); summary email from ecaps re terms (0.4); telephone conference with M. Frankel re next steps, adjournment and amended plan (0.8); conference with M. Povolny and c. Jordan re settlement agreement drafting (0.6).
09/07/23	01 CMJ	4.70	600.00	2,820.00	Draft settlement agreement.
09/08/23	CMJ	0.30	600.00	180.00	Participate in call with N. Kaiser regarding draft settlement.
09/08/23	01 CMJ	2.50	600.00	1,500.00	Revise settlement with N. Kaiser comments and related correspondence with N. Kaiser and M. Povolny.
09/08/23	01 NK	1.50	795.00	1,192.50	Work re settlement agreement.
09/09/23	01 CMJ	0.70	600.00	420.00	Revise settlement agreement with comments from N. Kaiser and client.

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09/09/23	NK	1.50	795.00	1,192.50	Work re settlement agreement and distribute.
09/10/23	01 NK	3.00	795.00	2,385.00	Extensive meeting with PJ re settlement agreement, Sale process and ancillary (2.0); meeting with Ian Reisner re same (1.0).
09/13/23	01 NK	1.40	795.00	1,113.00	Receipt and review ECap's proposed revisions to settlement agreement (0.5); review emails of settlement terms (0.3); revise settlement agreement (0.6).
09/14/23	01 CMJ	0.50	600.00	300.00	Revise latest draft settlement agreement and related correspondence with M. Povolny and N. Kaiser.
09/14/23	NK	1.80	795.00	1,431.00	Revise settlement agreement (1.0); telephone conference with M. Frankel re same and procedural matters (0.4); telephone conference with PJ re settlement agreement (0.4).
09/15/23	01 CMJ	0.10	0.00	0.00	[NO CHARGE] Participate in call with M. Povolny re settlement.
09/15/23	CMJ	0.50	600.00	300.00	Analyze revised draft settlement agreement.
09/15/23	01 NK	1.40	795.00	1,113.00	Meeting with PJ re possible settlement and related (0.5); review revised draft settlement agreement w ECap (0.5); conference with PJ re same (0.4).
09/16/23	01 NK	0.80	795.00	636.00	Meeting with PJ re settlement agreement and related (0.6); emails R. McCord re same (0.2).
09/21/23	01 NK	0.40	795.00	318.00	Telephone conference with R. Smolo ECap counsel re Deed in lieu docs (0.4).

Settlement/Non-Binding ADR 59.8 45,688.50

Outpost Pines
Post-Petition time

Cohen & Gresser LLP

Time Entries Summary
Matter: Outpost Pines LLC

Outpost Pines
Post-Petition time

Asset Analysis and Recovery	1.4	\$1,113.00
Assumption/Rejection of Leases and Contracts	3.3	\$2,539.50
Business Operations	23.8	\$16,861.50
Other Contested Matters (excluding assumption/rejection motions)	76.0	\$50,276.50
Plan and Disclosure Statement (including Business Plan)	21.0	\$15,976.50
Settlement/Non-Binding ADR	59.8	\$45,688.50
	185.30	\$132,455.00